

AARON D. FORD
Attorney General
RUDOLF M. D'SILVA (Bar #16227)
Deputy Attorney General
State of Nevada
Office of the Attorney General
1 State of Nevada Way, Suite 100
Las Vegas, Nevada 89119
(702) 486-3375 (phone)
(702) 486-3768 (fax)
Email: rdsilva@ag.nv.gov

*Attorneys for Defendant
Marvin Gonzalez*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERIC CINA,

Plaintiff,

v.

STATE OF NEVADA et al.,

Defendants.

Case No. 3:23-cv-00384-ART-CLB

**ORDER GRANTING MOTION TO
EXTEND THE TIME TO FILE
OPPOSITION TO MOTION TO
COMPEL DISCOVERY
(FIRST REQUEST)**

Defendant Marvin Gonzalez, by and through counsel, Aaron D. Ford, Nevada Attorney General and Rudolf M. D'Silva Deputy Attorneys General of the State of Nevada, Office of the Attorney General, hereby request to extend the time to file his Opposition to Plaintiff's Motion to Compel in ECF No. 33 for seven (7) days **from July 29, 2025, to August 5, 2025.**

I. POINTS AND AUTHORITY

Pursuant to Fed. R. Civ. P. 6(b), the "court may, for good cause, extend the time . . . with or without motion or notice . . . if a request is made, before the original time or its extension expires." Defendants seek a first extension to file their Opposition to Plaintiff's Motion to Compel Discovery. Good cause is present to grant an extension of seven (7) days to file an opposition.

In Plaintiff Eric Cina's (Cina) Motion to Compel Discovery (Motion) he is requesting that this Court compel Defendants to produce emails relating to a cell search conducted

1 on his cell on August 4, 2022. Defense counsel has completed his Opposition to Plaintiff's
2 Motion but requires an additional seven days to obtain a declaration from NDOC's IT
3 Manager explaining the efforts made to locate Cina's emails. Defense counsel has tried to
4 get in touch with him prior to the filing of this Opposition to no avail, but believes he will
5 be able to get in touch with NDOC's IT Manager within the next week.

6 Accordingly, Defendants respectfully request that the extension be granted for good
7 cause. *See Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1260, (9th Cir. 2010) (holding
8 that the "district court abused its discretion in denying party's timely motion" to extend
9 time because the party "demonstrated the 'good cause' required by Rule 6, and because
10 there was no reason to believe that [the party] was acting in bad faith or was
11 misrepresenting his reasons for asking for the extension"). **Defendants request an**
12 **additional seven (7) days, or until August 5, 2025, to file their Opposition to**
13 **Plaintiff's Motion.**

14 DATED this 29th day of July, 2025.

15 AARON D. FORD

16 Attorney General

17 By: /s/ Rudolf M. D'Silva

18 RUDOLF M. D'SILVA (Bar No. 16227)

19 Deputy Attorney General

20 *Attorneys for Defendants*

21 **IT IS SO ORDERED.**

22 **DATED:** July 30, 2025

23 
24 **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on July 29, 2025, I electronically filed the foregoing **MOTION TO EXTEND THE TIME TO FILE OPPOSITION TO MOTION TO COMPEL DISCOVERY (FIRST REQUEST)** via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically.

Eric Cina #1017561
Lovelock Correctional Center
1200 Prison Road
Lovelock, NV 89149
Plaintiff, Pro Se

/s/ Jamile Vazquez
Jamilé Vazquez, an employee of the
Office of the Nevada Attorney General